

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION**

In re:

USA GYMNASTICS,<sup>1</sup>

Debtor.

Chapter 11

Case No. 18-09108-RLM-11

**NOTICE OF CLAIMS OBJECTION, RESPONSE DEADLINE, AND HEARING**

PLEASE TAKE NOTICE that on July 3, 2019 USA Gymnastics, as debtor and debtor in possession in the above-captioned chapter 11 case (the “**Debtor**”), filed the *Debtor’s Third Omnibus Objection To Misclassified Administrative Expense Claims And Notice Of Response Deadline* [Dkt. 629] (the “**Third Omnibus Claims Objection**”), which has been set for a hearing (the “**Hearing**”) on **Wednesday, August 14, 2019 at 1:30 p.m. (Prevailing Eastern Time) in Room 329 of the United States Bankruptcy Court, 46 East Ohio Street, Indianapolis, Indiana 46204.**

PLEASE TAKE FURTHER NOTICE that claimants served with this Notice and the Third Omnibus Claims Objection should locate their names and claims on Exhibit A to the Third Omnibus Claims Objection. The claims listed on Exhibit A to the Third Omnibus Claims Objection may be reclassified as nonpriority, general unsecured claims. Claimants should read these papers carefully and discuss them with an attorney, if they have one.

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<sup>1</sup> The last four digits of the Debtor’s federal tax identification number are 7871. The location of the Debtor’s principal office is 130 E. Washington Street, Suite 700, Indianapolis, Indiana 46204.

PLEASE TAKE FURTHER NOTICE **that any responses to the Third Omnibus Claims Objection must be made in writing and filed by Monday, August 5, 2019 at 4:00 p.m. (Prevailing Eastern Time).**

PLEASE TAKE FURTHER NOTICE that those not permitted to file electronically must deliver any response by U.S. mail, courier, overnight/express mail, or in person at:

116 U.S. COURTHOUSE  
Attn: Chambers of the Honorable Judge Moberly  
46 East Ohio Street  
Indianapolis, Indiana 46204

PLEASE TAKE FURTHER NOTICE that if you mail your response to the court, you must mail it early enough so the court will receive it on or before the date stated above. You must also send a copy of your objection to:

JENNER & BLOCK LLP  
Attn: Catherine Steege and Melissa Root  
353 North Clark Street  
Chicago, Illinois 60654

PLEASE TAKE FURTHER NOTICE that if you do not take these steps, the Court may decide you do not oppose an order reclassifying your claim.

PLEASE TAKE FURTHER NOTICE that a dial-in telephone number for interested parties to participate in the Hearing by conference call is 1-888-273-3658, passcode: 9247462#. All callers shall keep their phones muted unless addressing the Court. All callers must identify themselves and the party(ies) they represent when addressing the Court. Callers shall not place their phones on hold during the Hearing.

PLEASE TAKE FURTHER NOTICE that copies of the Third Omnibus Claims Objection may be accessed through the case website at: <https://omnimgt.com/usagymnastics>, or by contacting the Debtor's attorneys, on PACER, or from the Clerk of the Court.

Dated: July 3, 2019

Respectfully submitted,

**JENNER & BLOCK LLP**

By: /s/ Catherine Steege

Catherine L. Steege (admitted *pro hac vice*)

Dean N. Panos (admitted *pro hac vice*)

Melissa M. Root (#24230-49)

353 N. Clark Street

Chicago, Illinois 60654

Tel: (312) 923-2952

Fax: (312) 840-7352

csteege@jenner.com

dpanos@jenner.com

mroot@jenner.com

*Counsel for the Debtor*

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing *Notice Of Claims Objection, Response Deadline, And Hearing* and the *Debtor's Third Omnibus Objection To Misclassified Administrative Expense Claims And Notice Of Response Deadline* [Dkt. 629] were filed electronically this 3rd day of July, 2019. Notice of these filings will be sent to all parties by operation of the Court's electronic filing system, as well as by first-class mail, postage prepaid, to the claimants listed on Exhibit A, attached hereto. Parties may access this filing through the Court's electronic filing system.

/s/ Melissa M. Root

*Counsel for the Debtor*

**EXHIBIT A**

**List Of Administrative Expense Claims For Reclassification**

**USA Gymnastics**  
**Third Omnibus Claims Objection**  
**List Of Administrative Expense Claims For Reclassification**

<b>Claimant's Name</b>	<b>Claim Number</b>	<b>Claim Class &amp; Amount</b>	<b>Grounds For Objection</b>	<b>Proposed Treatment</b>
Beth Gardner	81	503(b)(9) Priority: \$933.51	The claim does not meet the requirements for priority under section 503(b)(9).	The claim should be reclassified in its entirety as a general unsecured claim.
Caroline King	215	503(b)(9) Priority: \$120.00	The claim does not meet the requirements for priority under section 503(b)(9).	The claim should be reclassified in its entirety as a general unsecured claim.
Jeffrey Gluckstein	114	503(b)(9) Priority: \$1,600.00	The claim does not meet the requirements for priority under section 503(b)(9).	The claim should be reclassified in its entirety as a general unsecured claim.
John Cheng	36	503(b)(9) Priority: \$4,124.00	The claim does not meet the requirements for priority under section 503(b)(9).	The claim should be reclassified in its entirety as a general unsecured claim.
Kelly Mackinga	169	503(b)(9) Priority: \$59.00	The claim does not meet the requirements for priority under section 503(b)(9).	The claim should be reclassified in its entirety as a general unsecured claim.
Kiyolena Borch	73	503(b)(9) Priority: \$59.00	The claim does not meet the requirements for priority under section 503(b)(9).	The claim should be reclassified in its entirety as a general unsecured claim.
ProTrainings, LLC	121	503(b)(9) Priority: \$465.50	The claim does not meet the requirements for priority under section 503(b)(9).	The claim should be reclassified in its entirety as a general unsecured claim.
Rita Brown (Gymcert)	188	503(b)(9) Priority: \$3,415.80	The claim does not meet the requirements for priority under section 503(b)(9).	The claim should be reclassified in its entirety as a general unsecured claim.